

To: Ireland, Scott[ireland.scott@epa.gov]; Kuefler, Patrick[kuefler.patrick@epa.gov]; Higginbotham, Paul[PHIGGINB@idem.IN.gov]; JORDAN, SHERI[SJORDAN@idem.IN.gov]; Burget, Catherine A[CBurget@idem.IN.gov]
From: Hess, Catherine
Sent: Fri 10/31/2014 8:31:31 PM
Subject: Revised Indiana NOI form: Petroleum Products Terminals ING340000
NOI ING340000 Petro Prod Term 10-31-2014.doc

Scott:

We have made substantial revisions to the NOI form for ING340000 Petroleum Products Terminals based upon the comments from U.S. EPA Region 5 staff. The majority of items were things that needed to be corrected due to inadvertent errors on our part. We also did our best to clarify a number of the issues as well, especially with regard to the storm water discharges. A Petroleum Product Terminal with storm water runoff is not considered eligible for coverage under the standard general permit for storm water runoff associated with industrial activity, since this permit has effluent limits and the other does not. With regard to Comment #4 we researched the several PPTs in Indiana which have individual NPDES permits to determine the most likely pollutant parameters that are likely to be present at those facilities, and then we revised the listing of pollutant parameters in the Effluent Characteristics Table in Part F of the NOI accordingly. As a result of those revisions, we then felt it was appropriate to delete the sentence raised as an issue in Comment #5 and the paragraph about Testing Waivers, mentioned in Comment #6. This is because we now feel that the list of pollutants in Part F is more tailored to these types of discharges.

Also we do realize and acknowledge that we need to add several reference documents to the web page we have referenced in the NOI. We are working on that and hope to have those uploaded within the next week or so. I believe that we have addressed all of the remaining comments and suggestions. We appreciate the time and effort that you have given to assist us in developing this NOI template. Please let me know if you have any additional questions regarding this matter.

Sincerely,

Catherine Hess, Chief

Permits Administration Section

Office of Water Quality

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From: Ireland, Scott [mailto:ireland.scott@epa.gov]
Sent: Tuesday, September 30, 2014 10:06 AM
To: Hess, Catherine
Subject: Draft NOI reviews

Catherine,

We are working through the list of NOI's you sent.

With respect to: ING080000 Ground Water Petroleum Remediation Systems; we have no additional comments on this one.

With respect to: ING340000 Petroleum Products Terminals, we have the following comments:

1. In Section "D": SOURCE WATER INFORMATION on page 3 of 8 of the NOI, the description states in part "...need to complete Part IV of this application...." However, no Part IV is provided in the NOI. Please provide Part IV to the NOI or reference where Part IV may be found and describe the purpose for Part IV being stated.
2. In PART (I): ADDITIONAL REQUIRED ATTACHMENTS – 29. PROOF OF PUBLICATION in the 1st/ paragraph on page 5 of 8 of the NOI states "... (NPDES) general permit ING250000 to discharge non – process wastewater from a petroleum

products terminal.” The Petroleum Products Terminals *General Permit Number of ING340000*. Please clarify whether the general permit number of ING250000 is a typographical error or there is another Petroleum Products Terminal *General Permit Number of ING340000*.

3. In APPENDIX “A”: SUPPLEMENTAL INSTRUCTIONS on page 6 of 8 of the NOI all of the **ELIGIBILITY REQUIREMENTS Item X**: are (i) not all **ELIGIBILITY REQUIREMENTS Item X** are totally stated and (ii) under **ELIGIBILITY REQUIREMENTS Item 9** states 40 CFR §122.26 “Storm Water Discharges”. Please provide a list of all **ELIGIBILITY REQUIREMENTS Item X** and state all relevant provisions of 40 CFR §122.26 “Storm Water Discharges” that are pertinent to Petroleum Products Terminals under *General Permit Number of ING340000*.

4. Under APPENDIX “A”: SUPPLEMENTAL INSTRUCTIONS – **Part F, Items 20 and 21**: under **A. Existing Sources** in the 2nd/ paragraph on page 7 of 8 of the NOI are stating the following pollutants or parameters Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), Fecal coliform, pH, Total Residual Chlorine (TRC), Oil & Grease (O & G), Temperature (°F or °C) and Ammonia [NH₃ (as “N”)] to be analyzed under the provisions of 40 CFR Part 136. Please provide a detailed explanation for clarity as to the reason(s) for being primarily a domestic discharge based rather than a petroleum based analyses.

5. Under APPENDIX “A”: SUPPLEMENTAL INSTRUCTIONS – **Part F, Items 20 and 21**: under **B. New Dischargers** in the 2nd/ sentence on page 7 of 8 of the NOI states “Please note that follow up testing and reporting are required no later than two (2) years after the facility starts to discharge.” Please provide a detailed explanation to clarify the following: (i) the reason(s) for the two (2) years maximum for a New Discharger to provide to IDEM any reports including test analyses, (ii) same requirements as outlined in #4 above and (iii) the reason(s) for not stating compliance with 40 CFR Part 136 pertaining to analyses of pollutant parameters.

6. Under APPENDIX “A”: SUPPLEMENTAL INSTRUCTIONS – **Part F, Items 20 and 21**: under **C. Testing Weavers** in the 3rd/ sentence on page 7 of 8 of the NOI states “The permitting authority may waive the requirements for information about any pollutant or parameter if he determines that less stringent reporting requirements are adequate to support issuance of the permit.” Please provide an explanation to clarify the reason(s) for stating “less stringent reporting requirements are adequate to support issuance of the permit” and must site any and/or all statutes, regulations, laws under the Code of Federal Regulations (CFR), United States Code (U.S.C.), Clean Water Act (CWA), etc.

Thanks,

Scott

D. Scott Ireland

Chief, Section 1

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